

December 1, 2000

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Tennessee
EXECUTIVE SECRETARY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee

Dear Mr. Waddell:

This letter is being written on behalf of and with the concurrence of AT&T, Citizens Communications, Tennessee Rural Independent Coalition, United Telephone of the Southeast, TDS Telecom, XO Communications, SECCA, MCI WorldCom, Inc. and BellSouth Telecommunications, collectively referred to in this letter as the "industry".

Docket No: 00-00873, "TRA Notice of Proposed Rulemaking" proposes an extensive rewrite of Chapter 1220-4-2, Regulations for Telephone Telecommunications Service Providers. This proposed rewrite of the Telephone Service Standards will affect consumers, the TRA, existing service providers, and new service providers for many years to come. In that respect, the proposed rewrite is similar to legislation that overhauls or reforms an existing area of the law.

When the General Assembly considers reform or overhaul legislation that will affect a broad spectrum of interests, it generally seeks a great deal of input from all persons and entities that will be affected by the legislation. This input – which can include committee hearings and meetings with affected parties to attempt to work out mutually agreeable compromises – generally results in more balanced and fair legislation when considering and balancing the input of everyone who will be affected by it.

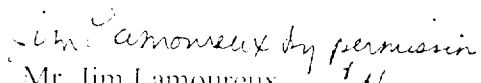
With that in mind, the original version of the proposed rewrite presents various technical, policy, and legal issues that need to be carefully addressed and balanced. If the rewrite did not address such a broad spectrum of issues, filing written comments might be an appropriate manner of suggesting appropriate revisions. It is evident from the comments presented during the November 16, 2000 public hearing, however, that any given provision of the proposed rewrite can have numerous (and perhaps unintended) downstream effects that impact one carrier differently than they impact another carrier. One carrier's proposed revision, therefore, may harm another carrier, but a compromise revision could satisfy all carriers while providing the benefits to Tennessee consumers that are intended by these rules.

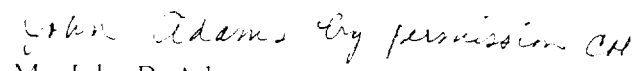
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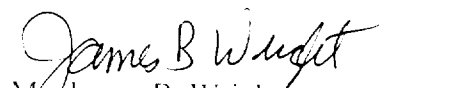
As it did during the November 16th hearing, the industry continues to collectively recommend holding workshops to facilitate this rule making process. The industry also recommends officially noticing the workshops and scheduling the workshops in a manner that will give interested parties time to prepare and to schedule the involvement of their respective company subject matter experts. A transcript of the workshops, as well as copies of any written comments that are filed in this docket, should be included in the official record in this docket.

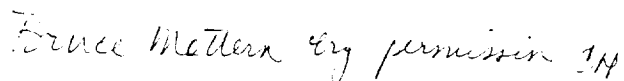
To begin this process the industry is attaching a proposal for the workshops.. As you can see, the proposal suggests a series of three workshops, each followed by the distribution of agreed rules revisions and a subsequent comment period. We appreciate your consideration of these recommendations, and we as an industry look forward to working with the TRA to develop rules that provides protection for Tennessee consumers without creating unnecessary, undue, and/or unintended consequences on the industry.

Sincerely



Mr. Jim Lamoureux
AT&T



Mr. John B. Adams
Citizens Communications and
Tennessee Rural Independent Coalition

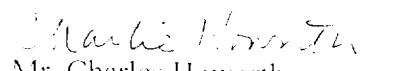

Mr. James B. Wright
United Telephone of the Southeast


Mr. Bruce H. Mottern
TDS Telecom


Ms. Dana Shaffer
XO Communications


Mr. Henry Walker
SECCA


Ms. Susan Berlin
MCI WorldCom, Inc.


Mr. Charles Howorth
BellSouth Telecommunications

TRA Proposed Service Standard Rules Workshops

Workshop I January 15, 2001

- 1220-4-2-.01 Definitions
- 1220-4-2-.02 Scope of Regulations
- 1220-4-2-.03 Records and Reports
- 1220-4-2-.09 White Page Directories
- 1220-4-2-.12 Customer Complaints
- 1220-4-2-.13 Accuracy Requirements
- 1220-4-2-.15 Prepaid Calling Cards
- 1220-4-2-.19 Lifeline and Link-up
- 1220-4-2-.22 Enforcement Provisions

Agreed rule revisions February 5, 2001

Workshop I February 26, 2001 Comments

Workshop II March 12, 2001

- 1220-4-2-.04 Customer Refunds for Service Outages
- 1220-4-2-.05 Customer Deposits
- 1220-4-2-.06 Disconnection of Local Service
- 1220-4-2-.07 Disconnection of Local Service to a Reseller
- 1220-4-2-.08 Privacy of Customer Information
- 1220-4-2-.14 Payment for Services

Agreed rule revisions April 2, 2001

Workshop II Comments April 23, 2001

Workshop III May 7, 2001

- 1220-4-2-.10 Emergency Service Provisioning
- 1220-4-2-.11 Telephone Construction
- 1220-4-2-.16 Adequacy of Service
- 1220-4-2-.17 Basic Obligations for ETCs
- 1220-4-2-.18 Quality of Service Mechanisms
- 1220-4-2-.20 Number Conservation
- 1220-4-2-.21 Toll Free County Wide Calling

Agreed rule revisions May 28, 2001

Workshop III June 18, 2001 Comments